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IN THE SECOND DISTRICT COURT, FARMINGTON DEPARTMENT
DAVIS COUNTY, STATE OF UTAH

N.A.R., INC.

Plaintiff,

v.

HEATHER COX

Defendant(s).

C O M P L A I N T
(Discovery Tier 1)

Case No.

JUDGE

Plaintiff, N.A.R., INC., complains of Defendant(s) and
alleges as follows:

1. That Plaintiff is a Utah Corporation, with its principal
place of business in Salt Lake County, Utah.
2. That Defendant(s) are residents of, or the subject agree-
ment was executed in, DAVIS COUNTY.
3. That the amount in controversy, exclusive of costs, interest
and attorneys' fees does not exceed \$10000.00.
4. That under the terms of a signed agreement, Defendant(s)
are indebted to:

America First Credit Union,

which has performed its obligations under any contract, in the
assigned balance of \$8061.74, for goods and services, together

with interest thereon at the current statutory rate since 06/30/2021.

5. That the agreement provides for a reasonable attorney's fee. (See attached).

6. That prior to this action the above account was assigned to Plaintiff herein, who is now entitled to bring suit thereon. Any repossession rights have been retained by the lender.

7. That Plaintiff has demanded payment of the sum due and Defendant(s) refused, or failed, to pay.

8. That the assigned balance may include a collection agency fee.

9. That the attorney will not share any attorney fee awarded or any portion thereof in violation of Rule 5.4, Utah Rules of Professional Conduct.

WHEREFORE, Plaintiff prays for judgment against Defendant(s) in the sum of \$8061.74, together with a collection agency fee of \$0.00, court costs, interest thereon, at the current statutory rate pursuant to UCA 15-1-1(2) for breach of contract since 06/30/2021, and a reasonable attorney's fee pursuant to Rule 73(d), Utah Rules of Civil Procedure, in the amount of \$350.00, or as established by affidavit pursuant to Rule 73(a) URCP.

DATED this 20 day of OCTOBER, 2021.

OLSON SHANER

/s/ Chip Shaner

By:_____

Chip Shaner

Attorneys for Plaintiff

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